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Alberta Gaming Commission

Annual Review 1985

Alberta
GAMING COMMISSION

Chairman

5th Floor South, John E. Brownlee Building, 10365 - 97 Street, Edmonton, Alberta, Canada T5J 3W7 403/427-9796

The Honourable Jim Horsman, Q.C.
Attorney General

Dear Mr. Horsman:

I am pleased to present the Alberta Gaming Commission's Annual Review for the year ending December 31, 1985.

Respectfully yours,

Krishan C. Joshee
Chairman

The Role of the Commission

The Alberta Gaming Commission is the provincial authority for licencing charitable and religious organizations to conduct and manage bingos, casinos, raffles and pull-ticket sales. The Commission was established in 1981, pursuant to Order in Council 124/81, in accordance with Section 190 of the Criminal Code (see Appendix A).

The Commission is charged with the responsibility to:

1. Conduct licencing in a fair and equitable manner and, through its established hearing process, resolve all issues related to a licence application or an organization's compliance with terms and conditions of licence (see Appendix B);
2. Provide the public with information concerning the licencing, conduct and management of gaming events; and
3. Review policies related to licencing, conduct and management of gaming events.

The Gaming Control Branch of the Attorney General's Department assists the Commission by reviewing applications and making recommendations, as well as providing technical and professional gaming advice. The Branch enforces the terms and conditions of gaming licences and audits the required financial reports — both essential functions for the effective control of gaming activities.

1985 Commission Members

Donald I. Gardner
Chairman

Jo Anne Chapman
Calgary

Robert J. Giesbrecht
Lethbridge

Oliver R. Hoare
Edmonton

Eric F. Jerrard
Grande Prairie

Ron. G. Steele
Stony Plain

Larry W. Yuzda
Calgary

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Review of 1985

Overview

During 1985, the Commission received approximately 7,000 applications for licences, an increase over the 6,700 applications received in 1984. Following the application review process, 6,644 licences were issued, a 3.8% increase over 1984. Total gross gaming revenue rose to $344 million, an increase of 18.3%. After payment of prizes and expenses, charitable and religious organizations in Alberta retained nearly $61.4 million to be used to support their community activities. This represented a 16.5% increase over 1984.

Commission Cases

During the year, the Commission heard a total of 164 individual cases. The Commission held regular hearings in Calgary and Edmonton, spending one day in each city each month. As the need arose, the Commission travelled to other centres for the purpose of holding public hearings. In addition, administrative meetings were conducted in local settings, with Commission members and staff reviewing specific proposals such as the formation of new bingo associations. In 1985, such meetings were held in Beaverlodge, Bonnyville, High Prairie, Red Deer, St. Paul and Wetaskiwin.

In this Annual Review, the section describing 24 "Selected Commission Cases" provides an outline of typical cases heard, and highlights those which were representative of significant issues. For instance, cases 85-30 and -69 dealt with the limits of eligibility and the role of policy in defining these limits. Cases 85-71/-88 and -90 concerned the eligibility of related organizations to hold casinos. Cases 85-133 and -141 led to limits being established for total prize payouts for bingo events. These, and other cases, illustrate the variety of issues which came before the Commission during the year.

Policy Reviews

The Commission met twice in executive session to consider policy. These sessions dealt with issues ranging from the eligibility of related charitable organizations to hold casinos, to the use of gaming funds for the purpose of national or international travel. In these sessions, the Commission was able to deal with broad topics, relying on experience gained through the hearing process, along with background information prepared by Commission and Gaming Control staffs. In this way, a systematic approach to areas of concern was maintained.

For example, in the case of national and international travel, routine reviews of licence applications indicated an increasing number of such requests. Audits of financial reports identified concerns regarding the way some organizations used gaming funds for travel expenses. The Commission initiated a procedure to ensure particulars of all travel proposals would be submitted for approval prior to any expenditures. At the same time, 18 hearings were held before the Commission concerning specific travel proposals. These activities, together with ongoing discussions between Commission staff and groups involved, resulted in the implementation of revisions to the travel guidelines. The objective of these revisions was to more clearly address the changing needs of the charitable community.

Commission Changes

In the early part of 1985, the appointment of M.L. Jacques to the Commission expired. Mr. Jacques, who was appointed in 1981, was one of the original members of the Commission. This position was subsequently filled with the appointment of Mr. Larry Yuzda of Calgary.

Mr. Krishan C. Joshee was appointed Chairman effective May 15, 1986, replacing Mr. D.I. Gardner. Mr. Gardner stepped down following his retirement from public service.

Bingos

In 1985, 2,001 bingo licences were issued, an increase of 7.7% over 1984. Total gross revenue was $122.5 million, while net profit was $20.7 million, representing growth rates of 41.6% and 35.5% respectively.

This continued growth was reflected in the number of bingo halls opened during the year. Through a combination of public hearings and administrative sessions, the Commission reviewed 11 new associations province-wide. By mid-year, the Commission had completed the public consultative process regarding revised terms and conditions of licence for members of bingo associations. These were applied to new associations and to existing associations as their members' licences came up for renewal.

One aspect of the expansion in bingo operations was a steady trend toward increased prize payouts at individual events. Although the Commission had earlier taken the position that it would not licence events with extraordinarily-large prize payouts, it had not established a fixed figure as to what constituted such an event. Late in the year, the Commission reviewed, at public hearings, two proposed bingo programs. Each intended to award approximately $20,000. After a

thorough review of the particulars of each case, and consideration of programs previously licenced, the Commission developed a guideline for all types of bingo. This established a maximum total prize payout of $15,000 per event. As prize payouts in bingo generally fluctuate with attendance, this figure was established as a licencing guideline. If attendance forecasts indicate the prize total would exceed $15,000, the program would then require revision before approval. This guideline provides licencees operational flexibility as it does not arbitrarily limit prize payouts at any specific event.

Casinos

During the year, 575 licences were issued, an increase of 4.2% over 1984. Total gross revenue was $102.2 million, while net profit was $12.7 million, representing growth rates of 11% and 19.2% respectively.

A charitable or religious organization is eligible for only one two-day casino each year, and only one casino at a time is allowed in any community. (In Edmonton and Calgary, however, two events are allowed on Fridays and Saturdays.) Under these conditions, the total number of casinos allowed in a year is limited. To insure that eligible organizations receive fair access to casino dates, the Commission conducted a thorough review of the eligibility policy. This review focused on the aspect of the policy which limits "related" organizations to only one casino each year.

This issue alone was the subject of 21 hearings before the Commission during the year. The question as to how various organizations may be related was explored through the public hearing process, through background information developed by Commission and Gaming Control staffs, and in executive policy sessions of the Commission. As a consequence, the Commission developed a procedure by which it worked together with interested organizations to reach a consistent and fair allocation of dates. As the Commission pursued this approach, it was able to refine the general policy to recognize and adjust to the many organizational structures and relationships which exist in Alberta's volunteer community.

With respect to the Hired Casino Personnel Registration Program, six registrations were revoked and two were suspended for violations of the conditions of registration. Three other registrations were suspended as a result of hearings before the Commission. A further three applicants for registration appeared before the Commission to appeal administrative decisions refusing registration because of previous criminal convictions. After a thorough review of each case, the Commission upheld the original decisions, finding that the applicants had been convicted of acts of dishonesty within five years of the application for registration.

Raffles

The Commission issued 3,397 licences in 1985, a decrease of 0.5% from 1984. Total gross revenue was $17.7 million, while net profit was $7.6 million. These figures represented declines of 1.1% and 3.1% respectively.

The total number of licences issued in Calgary and Edmonton decreased by 40. Compared with the previous year, this translated into a 6.8% reduction in gross revenue in these two cities. Outside those cities, however, the number of licences issued increased by 24, resulting in growth in gross revenue of 4.1%.

Pull-tickets

In 1985, the Commission issued 671 licences, an increase of 15.7% over 1984. Total gross revenue was $101.5 million, while net profit was $20.2 million, representing increases of 7.8% and 7.7% respectively.

While growth in pull-ticket sales in Calgary and Edmonton was modest (4.0% and 6.0% respectively), the number of licences issued outside the two centres increased by almost 21.3%. Sales in these areas reached $54.5 million, which represented 53.7% of the provincial total. Net profit from these sales was $10.8 million, a 12.3% increase over 1984. Reflecting this increased activity, the Commission heard 10 cases related to its policy of restricting sales to an organization's own premises. In all these cases, the Commission maintained that loosening restrictions governing suitable premises for the sale of pull-tickets would weaken the control system and would therefore not be in the public interest.

Gaming Statistics Highlights

Detailed gaming statistics for 1985 appear in Appendix D. Below is an overview of licenced gaming highlights, broken out by major population centres:

Location	Gross Revenues	Net Profits
Calgary	$116,626,534	$18,535,223
Edmonton	116,689,290	19,513,834
Ft. McMurray	4,317,444	844,699
Grande Prairie	4,856,003	1,138,160
Lethbridge	12,582,171	2,371,426
Medicine Hat	7,883,834	1,487,313
Red Deer	10,010,615	1,535,593
All Others	71,144,629	15,973,602
Total	$344,110,520	$61,399,850

Selected Commission Cases

ISSUE: Use of Credit Cards to Purchase Raffle Tickets

Case: 85-13

Background:
A major medical/health organization, licenced to conduct a raffle with 3,000 tickets at $100 each, requested to be allowed to accept credit cards for the purchase of tickets.

Decision:
It is a basic principle of licenced gaming in Alberta that credit is not permitted. It is for this reason that a term and condition of raffle licence has been:

> At time of sale, each ticket shall be exchanged for cash, or certified cheque or money order made payable to the organization.

To allow credit cards to be used for the purchase of raffle tickets would change this basic principle, and thus the request was refused.

ISSUE: Casino Eligibility

Case: 85-25

Background:
The organization in question had six members, all of whom were past members of an amateur junior football club. The applicant's objective was to build a new facility for that junior football club. At the same time, a support group to the club was slated for a casino in 1986.

Decision:
The applicant essentially acted as a building committee for the junior football club. For the purpose of the casino licence, the applicant and the club were considered related organizations. As a result, the applicant was not eligible for licence.

ISSUE: Location of Bingo Event

Case: 85-26

Background:
A rural parish council, eligible for a bingo licence, applied to hold its bingos at a successful bingo association located in a city 15 km away.

Decision:
An organization can be licenced to conduct bingos only within its own community. For the purposes of bingo, the parish council's community was defined as the town in which it resided, as well as any other town, village, or hamlet in the county, provided that licenced organizations in those areas had no objections. As this definition did not include the city in question, the council was not eligible to conduct bingo in that city.

ISSUE: Eligibility for Licencing

Case: 85-30 and 85-69

Background:
A fund-raising foundation for a provincial hospital applied for licencing. The board of the foundation was restricted to individuals who were members of the hospital's board of management. On this basis, the Commission originally ruled that this effectively made the foundation and the hospital one identity. Since the hospital was in the public realm, it was not eligible for licencing. Therefore, the foundation also was not eligible. The foundation subsequently requested a second hearing before the Commission to appeal the original decision.

Decision:
Section 190 of the Criminal Code empowers each province, through the office of the Lieutenant Governor, to determine the manner by which gaming may be licenced and subsequently regulated within that province. In Alberta, the Lieutenant Governor In Council has designated the Alberta Gaming Commission as the licencing authority pursuant to the relevant Criminal Code provisions.

The Commission's fundamental mandate is to determine eligibility for gaming licences, within the statutory provisions limiting such eligibility to charitable or religious organizations. However, these provisions are so general as to require public policy as a guide to the licencing function. That policy may be the sum total of written directives, administrative practices, and case-by-case determinations. In this manner, a broad-based policy has been developed. With respect to the case at hand, certain aspects of that policy were relevant. First, in order to insure the charitable character and intent of an organization, the Commission stipulates that it should have in place a volunteer membership, drawn from the community at large, with an executive elected in an open and free manner. In addition, to protect the integrity of licenced gaming, it is the volunteer membership which is to be responsible for, and actually involved in, the conduct and management of any licenced schemes.

A second aspect of the policy is that departments, agencies, and creatures of government are not charitable organizations, and therefore are not eligible for licencing. The Commission considers a body established by statute under which there exists a duty to provide certain specified public services, funded through public revenues, a creature of government. As the hospital conformed to these criteria, it was not eligible for licencing.

During the original hearing into the foundation's application for licence, it was established that executive membership in the foundation was restricted to the hospital's board of management. In effect, this established the foundation as an arm of the hospital management, with no mechanism to provide a true distinction between the executives of the two bodies. For purposes of eligibility for gaming licences, the two organizations appeared so closely linked as to be managerially indistinguishable. Therefore, the foundation was also deemed ineligible for licencing.

The requisite distinction between the two bodies would be provided through representation on the foundation's executive of volunteer membership drawn from the community at large. In this manner, an element of independence and separate accountability would be introduced to the foundation's decision-making structure, so that it could be considered eligible for licencing. However, the proceedings of the second hearing into the foundation revealed no essential change to its structure. Therefore, the foundation remained ineligible for licencing.

ISSUE: Use of Proceeds

Case: 85-34

Background:
A veterans' association applied to donate gaming proceeds to assist in funding graduation exercises for 20 registered nursing assistant students graduating from a local vocational training centre.

Decision:
Gaming proceeds can be used only to support educational activities associated with graduation such as the rental of space or equipment for commencement exercises, the provision of diplomas, or non-cash awards. Proceeds cannot be used for the costs of social activities such as banquets or entertainment, the purchase of graduation uniforms, or other similar accouterments. If the veterans' association could establish that the donation would be for educational purposes, the use of proceeds would be allowed.

ISSUE: Casino Eligibility

Case: 85-49

Background:
An individual bantam football team with approximately 50 members applied for a casino licence. The team was a member of a district football association which had been licenced for casinos.

Decision:
For the purposes of granting casino games licences, the various teams of the district bantam football association were considered related organizations. Among themselves and the association, they were eligible for only one casino. As the association was the overall coordinating body, it was considered the appropriate organization to licence, and thus the individual team was not considered eligible.

ISSUE: Proposed Bingo Program

Case: 85-53

Background:
A bingo association proposed to add one "playoff" game to its regular program. Winners of the playoff would qualify to participate in special monthly games, the prizes for which would be vacation packages. Once a year, a final grand-prize playoff game for an automobile would be held. The association also sought permission to use a variant on the standard bingo card, a "Player's Choice/Windfall" game.

Decision:
The total value of all prizes, including both cash and the retail value of merchandise, should approximate 65% of both admission charges and card/sheet sales collected at the event during which the prizes are to be awarded. Under this guideline, the value of the automobile would have exceeded the allowable percentage, and was therefore not approved. On the other hand, the trip with a retail value of $800 to $1000 met the guideline and was approved. The "Player's Choice/Windfall" portion of the card was, in the Commission's view, designed as a type of lottery scheme which is not allowed in Alberta. As a result, games using that feature of the card were not approved.

ISSUE: Proposed Raffle Prize Structure

Case: 85-58

Background:
A service club had previously been licenced to conduct a sports lottery based on the game results of a professional football club. A total of 2,500 tickets were printed, with each ticket containing scores for 16 games. Cash prizes were to be awarded for tickets bearing the official score at the end of the first quarter, half-time, third quarter and at the end of the game. Only 717 tickets were sold. The service club paid prizes only on those tickets sold. It is a term and condition of raffle licence that:

> Raffle rules shall provide for an alternate method of ensuring that all prizes are awarded if any specific winning ticket is unsold or unclaimed.

The club requested to be licenced for the same scheme. Rather than meeting the above requirement, the club proposed to guarantee that a minimum of 20% of sales revenue would be paid in prizes.

Decision:
The term and condition of licence was not amended. All prizes described in the application and on the ticket were to be awarded. The rules of the proposed raffle were to be amended to provide a method for awarding all prizes if any specific winning ticket(s) remained unsold or unclaimed. The intent of the term and condition in question is to protect the ticket buyer, who, when purchasing a ticket, should be assured that the advertised prizes will be awarded. To remove this requirement, and allow a licencee to provide reduced prizes, could impair the integrity of gaming in Alberta. Therefore, the proposal was not approved.

ISSUE: Use of Proceeds

Case: 85-59

Background:
A fraternal organization, licenced for bingos and casinos, requested to use gaming proceeds to lease and renovate a building. The proposed renovations were to include club-type facilities for members and a large hall to be used for banquets, dances and bingo events. In addition, the organization proposed to form a bingo association to operate in this facility.

Decision:
Gaming proceeds can be used only for charitable purposes. The development of a facility intended primarily for gaming activities was not considered to be a charitable activity, nor was the provision of clubrooms for the exclusive use of members. As a result, such a facility was not an allowable use of gaming proceeds. On the other hand, the development of a general purpose community facility, in which a number of activities would take place, and which would be readily accessible to the public, would be an allowable use of proceeds.

ISSUE: Charitable Status of Organization

Case: 85-67

Background:
A sailing club had applied for licencing in 1982. As a result of a Commission hearing held at that time, the club was deemed ineligible for licencing. In 1985, the club re-applied, indicating it had entered into a five-year lease with Alberta Recreation & Parks. Part of the lease included the development of a multi-use building.

Decision:
The sailing club was not a charitable organization. Rather, it was primarily organized for the social and recreational activities of its members, activities which were in their own self-interest. The proposed building was primarily intended as a clubhouse facility. The requirement that the facility be available to other groups was a requirement of the lease; it was not developed with the intent of being a general-use community facility. Therefore, the application was not approved by the Commission.

ISSUE: Casino Eligibility

Case: 85-71 and 85-88

Background:
Individual community leagues are considered eligible for casino licences. The Federation of Community Leagues made provision for leagues adjacent with one another to organize "area councils" to address issues of mutual concern. An area council applied for a casino licence. As it was deemed to be related to community leagues, the council was not eligible for a licence. The council subsequently requested a second hearing to provide additional information.

Decision:
The fundamental purpose of the area council concept is to engage in projects of common benefit to neighboring community leagues. In general, these projects

are analogous to the types of activities normally undertaken by individual community leagues within their own geographical boundaries. However, in contrast to a community league, whose members are individual residents within its boundaries, the area council membership consists of community league organizations. Those individuals who form the area council gain membership through affiliation with a specific community league. Thus, with respect to its basic activities and its membership, the area council is inextricably connected with, and related to, individual community leagues. Since each community league is eligible for a casino in its own right, area councils in general, and this council in particular, were not eligible for a casino.

ISSUE: Use of Proceeds

Case: 85-72

Background:
An amateur track club proposed to use gaming proceeds to send 36 members to Great Britain for approximately three weeks, during which time they would compete in a series of age-class track meets.

Decision:
For sports organizations, travel expenses are allowable if they directly support the competitive programs of the club. In terms of out-of-country travel, this would include assistance to individuals or teams representing Alberta or Canada in recognized international competitions. The proposed trip to Britain did not meet these requirements. The athletes were not selected on the basis of ability, nor did the proposed meets have any international recognition. This use of proceeds was therefore not approved.

ISSUE: Bingo Program

Case: 85-76

Background:
The applicant proposed a single-event bingo with a prize structure consisting of a $50,000 jackpot, five bonanza games at $2,500 each, and 15 regular games at $500 each. Total prize payout would have been $70,000. Admission was to be $100 per player, with extra cards sold for $10 each and bonanza cards sold at three for $10. To ensure the financial success of the bingo, it was proposed to pre-sell admissions and establish a cut-off date for pre-sales. The bingo was to be held in an arena seating 3,000 people.

Decision:
If licenced, the proposed bingo program would, by its card price, prize payout and potential seating capacity, mean a significant increase in the level of gaming currently considered acceptable. It would also have intensified the competitive atmosphere in the area, which would not be in the public interest. For these reasons, the program was not approved for licencing.

ISSUE: Use of Proceeds

Case: 85-82

Background:
An amateur soccer club proposed to use approximately $19,000 in gaming proceeds to pay the air fare for 16 players and two coaches to travel to Sweden and Denmark to participate in two tournaments.

Decision:
The team the club wished to assist had been both provincial and national champions. The proposed trip was not an exhibition tour but rather was for participation in two recognized international tournaments, sanctioned by both the provincial and national sport-governing bodies. On this basis, the trip expenses were approved.

ISSUE: Charitable Status

Case: 85-85

Background:
A foundation, organized under the not-for-profit provisions of the Companies Act, applied for a casino licence. The foundation's main purpose was to promote the design, construction and operation of a concert hall. Though the foundation had only 15 members, there also existed a Friends of the Foundation Society, incorporated under the Societies Act.

Decision:
The development of a concert hall was deemed a charitable activity, as it made a facility available for use by the general public. However, the most appropriate organization to apply for gaming licences was the Friends of the Foundation Society, rather than the foundation itself. The Friends of the Foundation Society was the organization which had the necessary volunteers to successfully conduct and manage gaming events.

ISSUE: Casino Eligibility

Case: 85-90

Background:
This applicant for casino licence was part of the minor hockey association in a major urban centre. The minor hockey association was organized into two basic streams; a competitive "AA" stream and a recreational "BB" stream. Each had a slightly different structure, with the "AA" stream divided into three major clubs and the "BB" stream divided into four zones, with boundaries following community league lines. There was also a separate parallel structure funded by a major service club. Many of these organizations had been licenced for casinos. In addition, all community leagues were eligible for casinos. In this case, the applicant was within one of the recognized zones and consisted of seven community leagues.

Decision:
A charitable or religious organization is eligible for only one public or private casino licence in any year. Where an organization has branches, subsidiaries, auxiliaries, or similar related groups with a specific common objective, only one of either the principal organization or any related group may be eligible for casino games licences to support that objective. This policy was instituted to ensure that, given the limited number of casino dates available, all eligible organizations would have fair access to casino dates.

In this case, the question of casino eligibility was directly related to the formal structure of amateur hockey within the city and the nature of the relationship among the various participating organizations. Although many of these participating organizations had been established as separate legal entities and directed certain aspects of their affairs independently, the system of amateur hockey at the minor level was based upon common acceptance of, and compliance with, a variety of rules, procedures and practices. The structure adopted by the Minor Hockey Association imposed not only a common direction upon these organizations, but also a formalized network of relationships through which coordination and cooperation would be achieved.

The fundamental characteristics of the system saw the division into the "AA" and "BB" streams of player development, with each stream organized in a hierarchical manner, along geographical lines. Applying those characteristics to the question of casino eligibility, it was clear that the effective, operational relationship among organizations derived from the zone system and the subsequent organization of play based on that structure. On this basis, the three major clubs that comprised the "AA" stream, the four zones which comprised the "BB" stream and the one organization representing the parallel structure were each eligible for casinos in their own right.

Any other organizations involved in minor hockey in the city were related to one of these organizations, and, therefore, were not eligible for casino licencing. Thus, the applicant, which was part of a zone, was not eligible for a casino licence.
(Note: A similar restriction does not exist for bingo or raffle licences.)

ISSUE: Teleconference Bingo Proposal

Case: 85-130

Background:
A society consisting of seven community associations, each of which was eligible for licencing in its own right, applied to operate a teleconference bingo. The bingo would take place one night a week in all seven community halls. Each hall was to have its own public address system connected via telephone to a central caller. Six of the member organizations had been licenced for bingo and pull-ticket sales in their own halls. The proposed bingo program consisted of one game with a prize pool that would accumulate over time. In addition, the society requested permission to sell pull-tickets during the bingo event.

Decision:
The society was licenced to conduct the teleconference bingo, provided the Gaming Control Branch was satisfied that the financial and inventory control systems were acceptable. Although the game with an accumulating prize pool was originally not approved, the society subsequently requested the Commission re-consider its decision. After a second hearing on this issue, the Commission approved the game in question. The seven individual community associations which formed the society were not licenced to sell pull-tickets during the society's bingo. Pull-tickets can be sold only within an organization's own premises, during an event sponsored by the organization. By joining together to operate the bingo, the individual community associations were no longer sponsoring separate events over which they exercised control.

The sale of pull-tickets has always been restricted to community bingos. The proposed magnitude of the bingo was such that it was no longer a "community" bingo.

ISSUE: Bingo Association — Lease Agreement

Case: 85-131

Background:
An existing bingo association renewed its lease, one clause of which read:

> The tenant shall pay to the Landlord all net proceeds of each bingo session in excess of such amount as is equal to a total of 25% of the net proceeds and 10% of the gross proceeds of such session, to a maximum rent for each session of $900.00 for evening sessions and of $500.00 for afternoon sessions. Rent shall be paid net to the Landlord as soon after each session as is reasonably possible, and in any event, within three days of the session.

The terms and conditions of licence for members of bingo associations state:

> Rate of rental for equipment or premises shall not be calculated as a straight percentage of revenue. (Rental rates based on sliding attendance schedules may be approved by the Commission upon review.) A licencee cannot claim rent for its own premises.

Decision:
The association's lease did not conform with the terms and conditions of bingo licence. It provided for the payment of a percentage of the gross receipts to the landlord. A lease agreement providing a sliding rental rate based upon attendance would be acceptable. Prior to new licences being issued, the association was to revise the new lease agreement with the landlord.

ISSUE: Bingo Program Prize Guidelines

Case: 85-133 and 85-141

Background:
Late in the year, the Commission reviewed two similar bingo proposals. In the first case, an organization proposed to hold a weekly bingo with a total possible prize payout of $19,000, not including one "early bird" and two "bonanza" games whose payout would be based upon attendance. Admission was to be $40 per player for 12 cards, with additional cards at three for $10. The event was to be held in an arena with a seating capacity of 500. In the second case, the organization proposed to hold an event every second week with a regular prize payout of $19,500 plus one game with a progressive "jackpot" and one "bonanza" game with an 100% payout.

Decision:
In response to these and other proposals, the Commission established a licencing guideline by which it would approve bingo programs whose total prize payout would not exceed $15,000 per event, inclusive of all types of games. The Commission believed this $15,000 maximum prize pool represented a reasonable and fair guideline, and would not significantly increase the level of gaming. Within this guideline, and with the previously-established guideline that 65% of gross revenue be prize payout, each organization could then determine admission and card prices, maximum seating capacity and prize structure. The guideline allowed organizations to develop bingo programs to meet their specific needs while being compatible with community standards. On this basis, neither program was approved as submitted.

ISSUE: Casino Eligibility

Case: 85-134

Background:
A parent support group to a school applied for casino licence to sponsor a national amateur volleyball championship. Another parent support group to the same school had been licenced for casinos over the years to support the school's music program and was slated for an upcoming casino.

Decision:
Only one support group to a school is eligible in any one year for a casino licence. If more than one group exists, each is considered related as it supports the further education and development of students, even though the specific activities may differ. As one group had been licenced in the past and was slated for another casino during 1985, the organization wishing to support the volleyball championship was not eligible for a casino games licence until the financial reports from the original group's casino were submitted.

ISSUE: Suitability of Premises for Pull-ticket Sales

Case: 85-135

Background:
The community support group to a junior hockey club, earlier deemed eligible for licencing, applied to sell pull-tickets during home games in the lobby area of the arena at which the club played.

Decision:
Pull-tickets can be sold only from an organization's own premises, from which the organization substantially delivers its services to the community. This requirement ensures sales are restricted to premises where access is controlled by the licencee, so that sales are in accordance with current community standards. The arena in question was not the group's facility, nor was it one over which they controlled access. As a result, they were not eligible for a licence to sell pull-tickets in that location.

ISSUE: Location of a Casino Event

Case: 85-149

Background:
An ethno-cultural association which was licenced to conduct a casino in Edmonton during July, 1985, subsequently applied to conduct a casino in St. Albert in January, 1986.

Decision:
An organization will be licenced to conduct a casino only in its own city, town or community. The community is defined as the one in which the organization is primarily resident and in which it delivers its programs. This association's programs were primarily delivered in, and intended for, Edmonton, and the vast majority of its members resided in that city. It was neither a province-wide organization with a distinct presence in other communities, nor did it deliver specific programs in communities other than Edmonton. As a result, the association was restricted to holding casinos in Edmonton.

ISSUE: Use of Proceeds

Case: 85-153

Background:
A service club, licenced for the sale of pull-tickets, requested to use 75% of the net proceeds from these sales to be applied against their building debt for a period of two years. Given past sales figures, this would represent approximately $260,000 over the two-year period.

Decision:
Based upon the information provided, it would have cost approximately $170,000 to make the facility available to the community, including mortgage payments, repairs to the structure and property taxes. Given that the organization had done, and continued to do, its utmost to reduce its costs, the Commission granted special consideration for a 12-month period only. To allow more than this amount would mean that gaming proceeds would be used to subsidize activities and services provided to the members. The balance of gaming proceeds would be directed toward other approved charitable or religious purposes.

The organization was to ensure that its gaming financial records were maintained so the total amount of gaming revenue used for its building fund could be determined on a monthly basis. Any extension of this special consideration would be the subject of a further review of the organization's position.

ISSUE: Use of Proceeds

Case: 85-155

Background:
A year-round swim club, with approximately 48 members, had received approval to use gaming proceeds for training aids and equipment, leadership training for volunteer coaches, and travel to out-of-town competitions. Subsequently, the club applied to use gaming proceeds to send two coaches to a coaches' conference in Florida.

Decision:
Gaming proceeds can be used only for charitable purposes. These would include travel directly related to providing the organization's service to the community. The club did not demonstrate that sending the coaches to Florida was essential. There was no indication that the education offered was unique, nor that it was not available in Alberta or in Canada. Therefore, the request for this use of proceeds was not approved.

Appendix A

Excerpts from the Criminal Code, Part V., Section 190.

The authority of the Gaming Commission for the licencing of lottery schemes in the province of Alberta is defined by Section 190 of the Criminal Code. In December, 1985, the relevant section of the Code was amended. As the amendment fell within the year in review, both versions of the text in question follow:

Text Prior to December, 1985:

"190. (1) Notwithstanding any of the provisions of this part relating to gaming and betting, it is lawful

(c) for a charitable or religious organization, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in the province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (g) or subsection 189(4), otherwise than in relation to a dice game, three-card monte, punch board or coin table, if

(i) the proceeds for the lottery scheme are used for a charitable or religious object or purpose, and

(ii) in the case of a lottery scheme conducted by the charitable or religious organization at a bazaar,

(A) the amount or value of each prize awarded does not exceed one hundred dollars, and

(B) the money or other valuable consideration paid to secure a chance to win a prize does not exceed fifty cents;

(d) for an agricultural fair or exhibition or an operator of a concession leased by an agricultural fair or exhibition board, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (f) or subsection 189(4);

(e) for any person, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme at a public place of amusement in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (g) or subsection 189(4), otherwise than in relation to a dice game, three-card monte, punch board or coin table, if

(i) the amount or value of each prize awarded does not exceed one hundred dollars, and

(ii) the money or other valuable consideration paid to secure a chance to win a prize does not exceed fifty cents; and

(2) Subject to this Act, a licence issued by or under the authority of the Lieutenant Governor in Council of a province as described in paragraph 1 (c), (d) or (e) or subsection (1.1) may contain such terms and conditions relating to the conduct and management of the lottery scheme to which the licence relates as the Lieutenant Governor in Council of that province or the person or authority in the province designated by him may prescribe.

(5) In this section "lottery scheme" includes a game.

(6) Nothing in this section shall be construed as authorizing making or recording of bets made through the agency of a pari-mutuel system, other than in accordance with section 188. 1968-69 c. 38, s. 13."

Text After December, 1985:

"190. (1) Notwithstanding any of the provisions of this Part relating to gaming and betting, it is lawful

(b) for a charitable or religious organization, pursuant to a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province if the proceeds from the lottery scheme are used for a charitable or religious object or purpose;

(c) for the board of a fair or of an exhibition or an operator of a concession leased by that board, to conduct and manage a lottery scheme in a province where the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof has

(i) designated that fair or exhibition as a fair or exhibition where a lottery scheme may be conducted and managed, and

(ii) issued a licence for the conduct and management of a lottery scheme to that board or operator;

(d) for any person, pursuant to a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme at a public place of amusement in the province if

(i) the amount or value of each prize awarded does not exceed five hundred dollars, and

(ii) the money or other valuable consideration paid to secure a chance to win a prize does not exceed two dollars;

(f) for any person, pursuant to a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage in the province a lottery scheme that is authorized to be conducted and managed in one or more provinces where the authority by which the lottery scheme was first authorized to be conducted and managed consents thereto;

(g) for any person, for the purpose of a lottery scheme that is lawful in a province under any of paragraphs (a) to (f), to do anything in the province, in accordance with the applicable law or licence, that is required for the conduct, management or operation of the lottery scheme or for the person to participate in the scheme; and

(h) for any person to make or print anywhere in Canada or to cause to be made or printed anywhere in Canada anything relating to gaming and betting that is to be used in a place where it is or would, if certain conditions provided by law are met, be lawful to use such a thing, or to send, transmit, mail, ship, deliver or allow to be sent, transmitted, mailed, shipped, or delivered or to accept for carriage or transport or convey any such thing where the destination thereof is such a place.

(2) Subject to this Act, a licence issued by or under the authority of the Lieutenant Governor in Council of a province as described in paragraph (1)(b), (c), (d) or (f) may contain such terms and conditions relating to the conduct, management and operation of or participation in the lottery scheme to which the licence relates as the Lieutenant Governor in Council of that province, the person or authority in the province designated by him or any law enacted by the legislature of that province may prescribe.

(3) Every one who, for the purposes of a lottery scheme, does anything that is not authorized by or pursuant to a provision of this section

(a) in the case of the conduct, management or operation of that lottery scheme,

(i) is guilty of an indictable offense and liable to imprisonment for a term not exceeding two years, or

(ii) is guilty of an offence punishable on summary conviction; or

(b) in the case of participating in that lottery scheme, is guilty of an offence punishable on summary conviction.

(4) In this section, "lottery scheme" means a game or any proposal, scheme, plan, means, device, contrivance or operation described in any of paragraphs 189(1)(a) to (g) whether or not it involves betting, pool selling, or a pool system of betting other than

(a) a dice game, three-card monte, punch board or coin table;

(b) bookmaking, pool selling or the making or recording of bets, including bets made through the agency of a pool or pari-mutuel system, on any race or fight, or on a single sport event or athletic contest; or

(c) for the purposes of paragraphs (1)(b) to (f), a game or proposal, scheme, plan, means, device, contrivance or operation described in any of paragraphs 189(1)(a) to (g) that is operated on or through a computer, video device or slot machine, within the meaning of subsection 180(3).

(5) For greater certainty, nothing in this section shall be construed as authorizing the making or recording of bets on horse races through the agency of a pari-mutuel system other than in accordance with section 188."

Appendix B

Alberta Gaming Commission Licencing Policy Guideline (The Alberta Gazette, May 15, 1981)

1(1) In this guideline

(a) "Commission" means the Alberta Gaming Commission;
(b) "fair" means an agricultural fair or exhibition;
(c) "Gaming Control Branch" means the Gaming Control Branch of the Department of the Attorney General;
(d) "lottery scheme" includes bingos, raffles, pull-ticket lotteries and casino games;
(e) "organization" means a charitable or religious organization;
(f) "prescribed" means prescribed by the Commission.

(2) An organization or fair wishing to conduct a lottery scheme shall submit an Application in the prescribed form to the Commission.

(3) The Commission shall forward the Application to the Gaming Control Branch and an employee in the Gaming Control Branch designated by the Chief Inspector of the Branch shall, on receipt of the Application, review the Application, and, if he considers it necessary, conduct an investigation regarding the advisability of issuing a Licence and make a recommendation and report in that regard to the Commission.

(4) The Commission, on receiving a recommendation and report and on reviewing the Application shall
(a) issue the Licence, and may make the Licence subject to any terms and conditions it considers appropriate, or
(b) if it appears to the Commission that there is cause for concern as to whether a Licence should be issued, set a date for a hearing on the matter.

(5) The Commission may, before acting under subsection (4) request other information from the Gaming Control Branch and the applicant.

(6) The Commission shall give notice in writing of the hearing to the Gaming Control Branch and the applicant and the notice shall
(a) set out with sufficient clarity the basis on which the Commission feels there is cause for concern as to whether the applicant should be issued a Licence, and
(b) set out the time and place for the hearing.

(7) Notice of the hearing shall be served on the applicant and the Gaming Control Branch either personally or by certified mail addressed to the applicant or the Gaming Control Branch at the address shown on the Application.

(8) At the hearing the employee in the Gaming Control Branch referred to in subsection (3) and the applicant are entitled to
(a) be present.
(b) make representations in respect of the Application orally and in writing, and
(c) be represented by counsel.

(9) A hearing shall be open to the public unless the Commission feels that it is advisable that all or part of the hearing be held in camera, in which case it may so direct.

(10) After considering the representations of the parties and any other evidence it considers appropriate the Commission shall
(a) issue the Licence, and may make the Licence subject to any terms and conditions it considers appropriate, or
(b) refuse to issue the Licence.

(11) If the Commission refuses to issue the Licence it shall give written reasons for doing so and serve those reasons on the applicant and the Gaming Control Branch in the manner provided in subsection (7).

(12) A Licence issued by the Commission is subject to the terms and conditions on it or attached to and forming part of it, and to any further terms and conditions made by the Commission from time to time.

2(1) No Licence fee is payable in respect of a Bingo Licence or a Raffle Licence.

(2) The licence fee payable in respect of
(a) a Pull Ticket Licence is an amount equal to one per cent of the product of the estimated number of units times the gross revenue per unit,
(b) a Casino Licence issued to an organization is an amount equal to the product of $10 times the number of games times the number of days the Casino operates, and
(c) a Casino Licence issued to a fair is an amount equal to the product of $25 times the number of games times the number of days the Casino operates.

Appendix C

Summary of Commission Hearings

	1983	1984	1985
TOTAL CASES HEARD	140	187	164
Written decisions issued	131	184	160
Decisions deferred	9	3	4
Applications withdrawn prior to hearing	2	7	7
TYPES OF ISSUES HEARD AT HEARING			
Charitable eligibility of organization	71	87	79
Suitable use of gaming proceeds	27	49	43
Casino eligibility concerning related organizations	12	14	21
Issues related to terms and conditions of licence	21	45	25
Review of large ticket-value raffles prior to licencing	5	1	2
Review of proposed bingo associations	10	16	5
Issues related to registration status of hired casino personnel	4	3	6
TOTAL*	**150**	**215**	**181**

* Not equal to "total cases heard", as each case may involve more than one issue.

HEARING DECISIONS REGARDING LICENCES ISSUED			
Applications approved for licencing			
Bingo	172	215	114
Casino	25	28	24
Raffle	27	32	16
Pull-Ticket	4	8	3
TOTAL	**228**	**283**	**157**
Applications not approved for licencing			
Bingo	15	33	13
Casino	18	19	26
Raffle	17	18	19
Pull-Ticket	7	10	6
TOTAL	**57**	**80**	**64**

Appendix D

Gaming Statistics

(Compiled by Audit Section, Gaming Control Branch, Department of the Attorney General)

Table 1 Totals of All Licenced Gaming 1983-1985

	Licences	Events*	$ Licence Fees	$ Total Gross	$ Prizes Winnings	%	$ Expenses	%	$ Net Profit	%
1983										
Bingo	1,536	32,345	—	54,310,548	37,941,009	69.8	5,415,060	10.0	10,954,479	20.2
Casino	544	1,086	330,540	87,163,224	67,751,003	77.7	8,754,891	10.1	10,662,330	12.2
Raffle	3,277	8,146	23,350	17,125,752	7,388,158	43.1	2,188,789	12.8	7,548,805	44.1
Pull Ticket	469	469	858,261	85,957,080	63,595,823	74.0	5,169,899	6.0	17,191,358	20.0
TOTAL	**5,826**	**42,046**	**1,212,151**	**244,561,604**	**176,675,993**	**72.2**	**21,528,639**	**8.8**	**46,356,972**	**19.0**
1984										
Bingo	1,858	37,158	100	86,526,008	60,717,483	70.2	10,485,739	12.1	15,322,786	17.7
Casino	552	1,108	347,930	92,104,459	72,154,429	78.3	9,251,341	10.1	10,698,689	11.6
Raffle	3,413	9,807	20,550	17,938,091	7,676,949	42 8	2,377,213	13.2	7,883,929	44.0
Pull Ticket	580	580	946,495	94,206,965	69,726,063	74.0	5,681,628	6.0	18,799,274	20.0
TOTAL	**6,403**	**48,653**	**1,315,075**	**290,775,523**	**210,274,924**	**72.3**	**27,795,921**	**9.6**	**52,704,678**	**18.1**
1985										
Bingo	2,001	39,720	—	122,543,089	86,591,782	70.7	15,191,439	12.4	20,759,868	16.9
Casino	575	1,154	356,830	102,266,315	79,831,902	78.1	9,675,661	9.4	12,758,752	12.5
Raffle	3,397	10,098	20,000	17,738,146	7,749,384	43.7	2,352,084	13.3	7,636,678	43.0
Pull Ticket	671	671	1,023,392	101,562,970	75,193,635	74.0	6,124,783	6.0	20,244,552	20.0
TOTAL	**6,644**	**51,643**	**1,400,222**	**344,110,520**	**249,366,703**	**72.5**	**33,343,967**	**9.7**	**61,399,850**	**17.8**

*For bingo, this represents the number of sessions; for casinos, the number of days; for raffles, the number of draw dates, and for pull-tickets, the number of licences.

Graph 1 All Licenced Gaming (1981-1985) **millions of $**

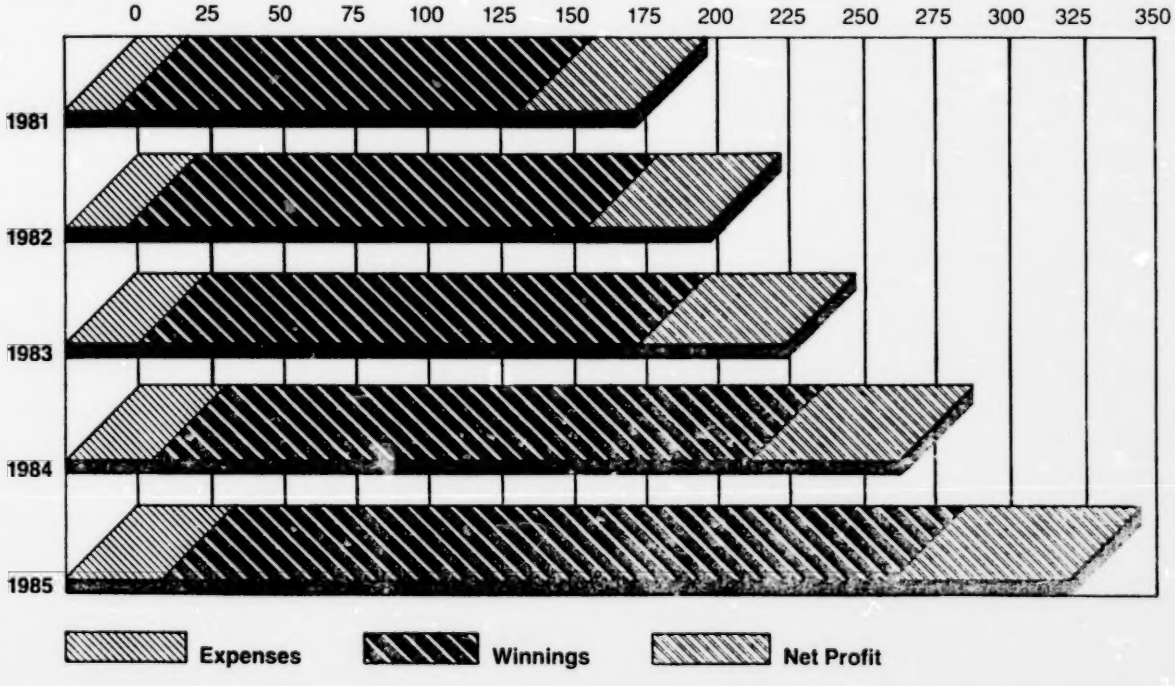

Table 2 Licenced Bingos 1983-1985

	Licences	Events	$ Licence Fees*	$ Total Gross	$ Prizes/Winnings	%	$ Expenses	%	$ Net Profit	%
1983										
Edmonton	398	7,838	—	27,613,210	19,071,433	69.1	3,060,598	11.1	5,481,179	19.8
Calgary	120	6,009	—	7,813,792	6,171,185	79.0	643,571	8.2	999,036	12.8
Others	1,018	18,498	—	18,883,546	12,698,391	67.2	1,710,891	9.1	4,474,264	23.7
TOTAL	**1,536**	**32,345**	**—**	**54,310,548**	**37,941,009**	**69.8**	**5,415,060**	**10.0**	**10,954,479**	**20.2**
1984										
Edmonton	607	9,122	100	41,344,544	28,756,417	69.6	5,136,748	12.4	7,451,379	18.0
Calgary	179	8,119	—	20,636,464	15,221,287	73.8	3,056,894	14.8	2,358,283	11.4
Others	1,072	19,917	—	24,545,000	16,739,779	68.2	2,292,097	9.3	5,513,124	22.5
TOTAL	**1,858**	**37,158**	**100**	**86,526,008**	**60,717,483**	**70.2**	**10,485,739**	**12.1**	**15,322,786**	**17.7**
1985										
Edmonton	618	9,717	—	53,620,030	37,956,324	70.8	6,792,028	12.7	8,871,678	16.5
Calgary	204	7,939	—	31,013,918	22,163,173	71.4	4,360,592	14.1	4,490,153	14.5
Others	1,179	22,064	—	37,909,141	26,472,285	69.8	4,038,819	10.7	7,398,037	19.5
TOTAL	**2,001**	**39,720**	**—**	**122,543,089**	**86,591,782**	**70.7**	**15,191,439**	**12.4**	**20,759,868**	**16.9**

*For agricultural fairs and exhibition boards only.

Graph 2 Bingos (1981-1985)
millions of $

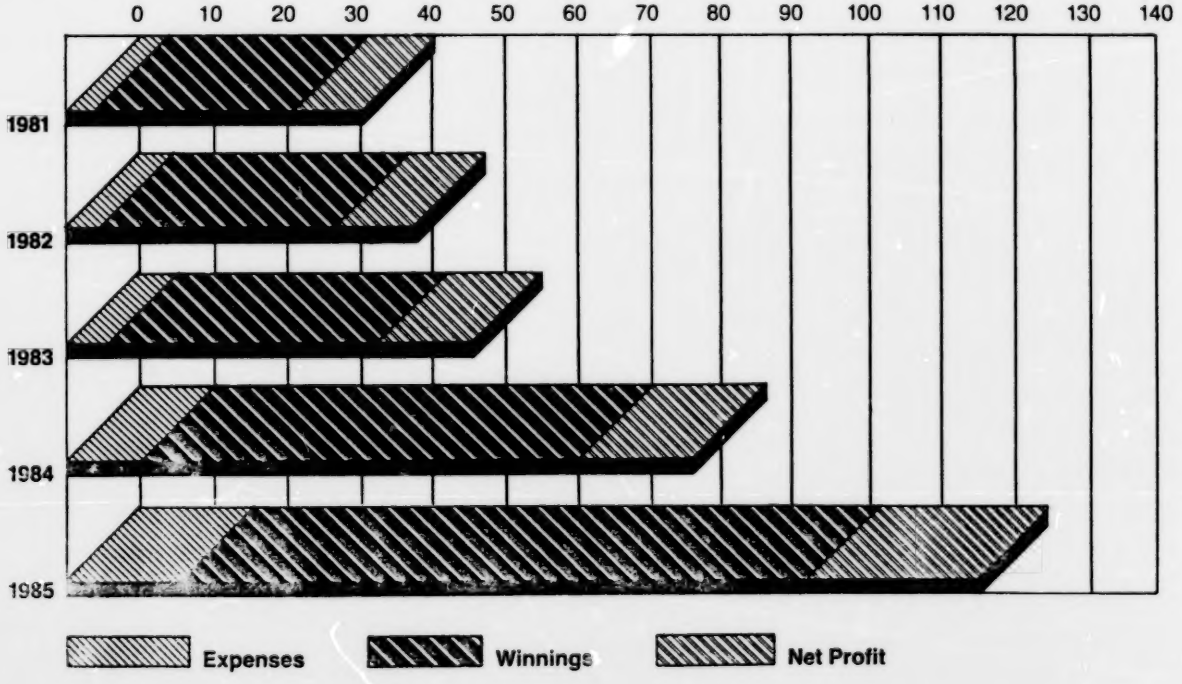

Table 3 Licenced Casinos 1983-1985

	Licences	Events	$ Licence Fees	$ Total Gross*	$ Prizes/Winnings	%	$ Expenses	%	$ Net Profit	%
1983										
Edmonton	193	390	143,230	39,918,711	30,804,662	77.2	3,564,946	8.9	5,549,103	13.9
Calgary	187	381	142,100	41,233,183	32,486,057	78.8	4,213,022	10.2	4,534,104	11.0
Others	164	315	45,210	6,016,330	4,460,284	74.1	976,923	16.2	579,123	9.7
TOTAL	**544**	**1,086**	**330,540**	**87,168,224**	**67,751,003**	**77.7**	**8,754,891**	**10.1**	**10,662,330**	**12.2**
1984										
Edmonton	196	396	145,650	41,138,480	32,016,640	77.8	3,665,553	8.9	5,456,287	13.2
Calgary	194	395	152,150	43,973,586	34,873,889	79.3	4,520,315	10.3	4,579,382	10.4
Others	162	317	50,130	6,992,393	5,263,900	75.3	1,065,473	15.2	663,020	9.5
TOTAL	**552**	**1,108**	**347,930**	**92,104,459**	**72,154,429**	**78.3**	**9,251,341**	**10.1**	**10,698,689**	**11.6**
1985										
Edmonton	193	392	144,570	45,154,450	35,041,155	77.6	3,742,636	8.3	6,370,659	14.1
Calgary	194	394	153,750	48,463,121	38,217,173	78.9	4,611,219	9.5	5,634,729	11.6
Others	188	368	58,510	8,648,744	6,573,574	76.0	1,321,806	15.3	753,364	8.7
TOTAL	**575**	**1,154**	**356,830**	**102,266,315**	**79,831,902**	**78.1**	**9,675,661**	**9.4**	**12,758,752**	**12.5**

*For casinos, "gross" equals "drop" — the total of money spent to purchase chips.

Graph 3 Casinos (1981-1985)
millions of $

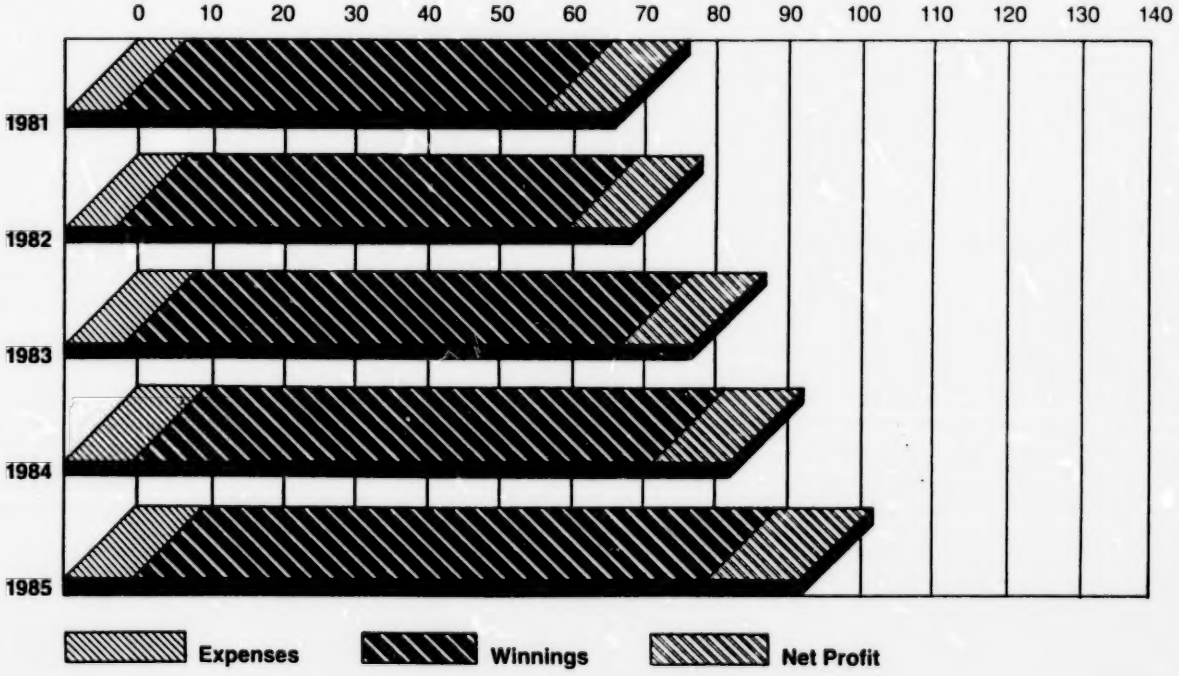

Table 4 Licenced Pull-Tickets 1983-1985

	Licences	Events	$ Licence Fees	$ Total Gross	$ Prizes/Winnings	%	$ Expenses	%	$ Net Profit	%
1983										
Edmonton	21		114,128	11,603,853	8,662,040	74.6	719,024	6.2	2,222,789	19.2
Calgary	126		329,605	33,232,886	24,421,999	73.5	1,950,938	5.9	6,859,949	20.6
Others	322		414,528	41,120,341	30,511,784	74.2	2,499,937	6.1	8,108,620	19.7
TOTAL	**469**	**—**	**858,261**	**85,957,080**	**63,595,823**	**74.0**	**5,169,899**	**6.0**	**17,191,358**	**20.0**
1984										
Edmonton	37		126,668	12,627,507	9,420,490	74.6	785,749	6.2	2,421,268	19.2
Calgary	134		324,294	32,352,378	23,713,875	73.3	1,925,757	6.0	6,712,746	20.7
Others	409		495,533	49,227,080	36,591,698	74.3	2,970,122	6.1	9,665,260	19.6
TOTAL	**580**	**—**	**946,495**	**94,206,965**	**69,726,063**	**74.0**	**5,681,628**	**6.0**	**18,799,274**	**20.0**
1985										
Edmonton	32		134,158	13,384,032	9,986,688	74.6	816,105	6.1	2,581,239	19.3
Calgary	143		339,415	33,653,160	24,799,329	73.7	1,994,070	5.9	6,859,761	20.4
Others	496		549,819	54,525,778	40,407,618	74.1	3,314,608	6.1	10,803,552	19.8
TOTAL	**671**	**—**	**1,023,392**	**101,562,970**	**75,193,635**	**74.0**	**6,124,783**	**6.0**	**20,244,552**	**20.0**

Graph 4 Pull-Tickets (1981-1985)
millions of $

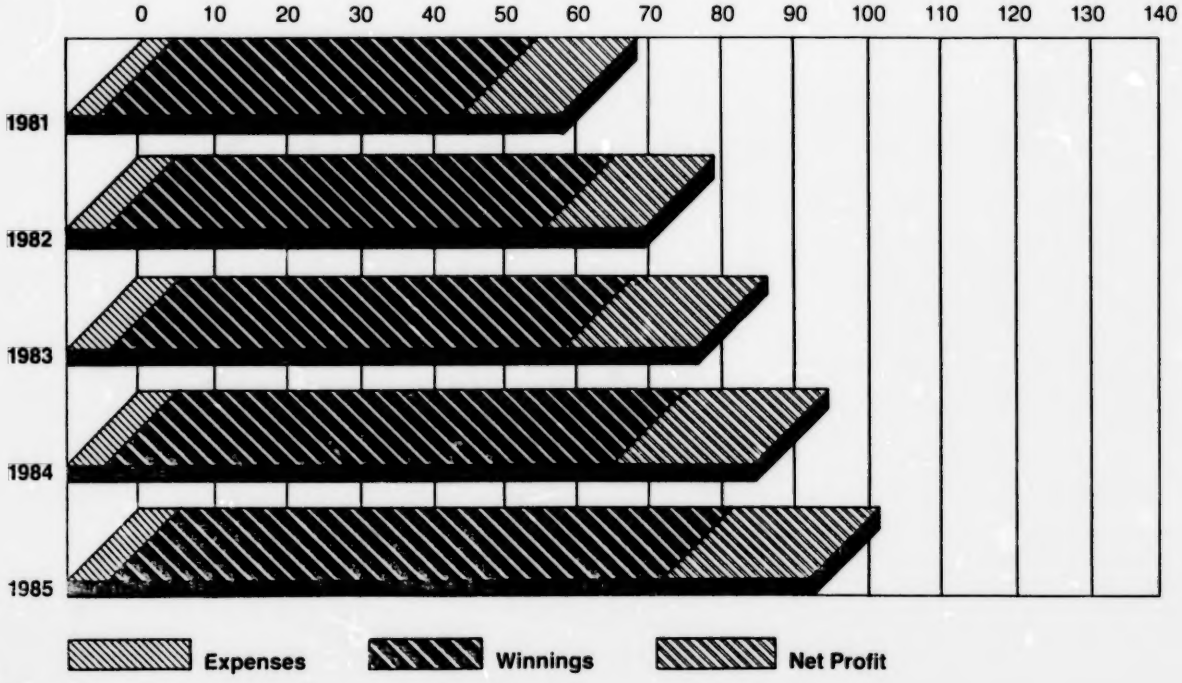

Table 5 Licenced Raffles 1983-1985

	Licences	Events	$ Licence Fees*	$ Total Gross	$ Prizes Winnings	%	$ Expenses	%	$ Net Profit	%
1983										
Edmonton	491	1,292	7,600	3,972,974	1,619,193	40.8	517,256	13.0	1,836,525	46.2
Calgary	307	1,433	10,600	3,464,510	1,373,640	39.6	646,394	18.7	1,444,476	41.7
Others	2,479	5,421	5,150	9,688,268	4,395,325	45.4	1,025,139	10.6	4,267,804	44.0
TOTAL	**3,277**	**8,146**	**23,350**	**17,125,752**	**7,388,158**	**43.1**	**2,188,789**	**12.8**	**7,548,805**	**44.1**
1984										
Edmonton	521	1,251	7,700	4,980,820	2,284,280	45.9	763,856	15.3	1,932,684	38.8
Calgary	364	2,801	10,600	3,634,598	1,347,580	37.1	743,317	20.4	1,543,701	42.5
Others	2,528	5,755	2,250	9,322,673	4,045,089	43.4	870,040	9.3	4,407,544	47.3
TOTAL	**3,413**	**9,807**	**20,550**	**17,938,091**	**7,676,949**	**42.8**	**2,377,213**	**13.2**	**7,883,929**	**44.0**
1985										
Edmonton	490	1,040	7,600	4,530,778	2,130,057	47.0	710,463	15.7	1,690,258	37.3
Calgary	355	2,343	11,000	3,496,335	1,203,955	34.4	741,800	21.2	1,550,580	44.4
Others	2,552	6,715	1,400	9,711,033	4,415,372	45.5	899,821	9.2	4,395,840	45.3
TOTAL	**3,397**	**10,098**	**20,000**	**17,738,146**	**7,749,384**	**43.7**	**2,352,084**	**13.3**	**7,636,678**	**43.0**

* For agricultural fairs and exhibition boards only.

Graph 5 Raffles (1981-1985)
millions of $

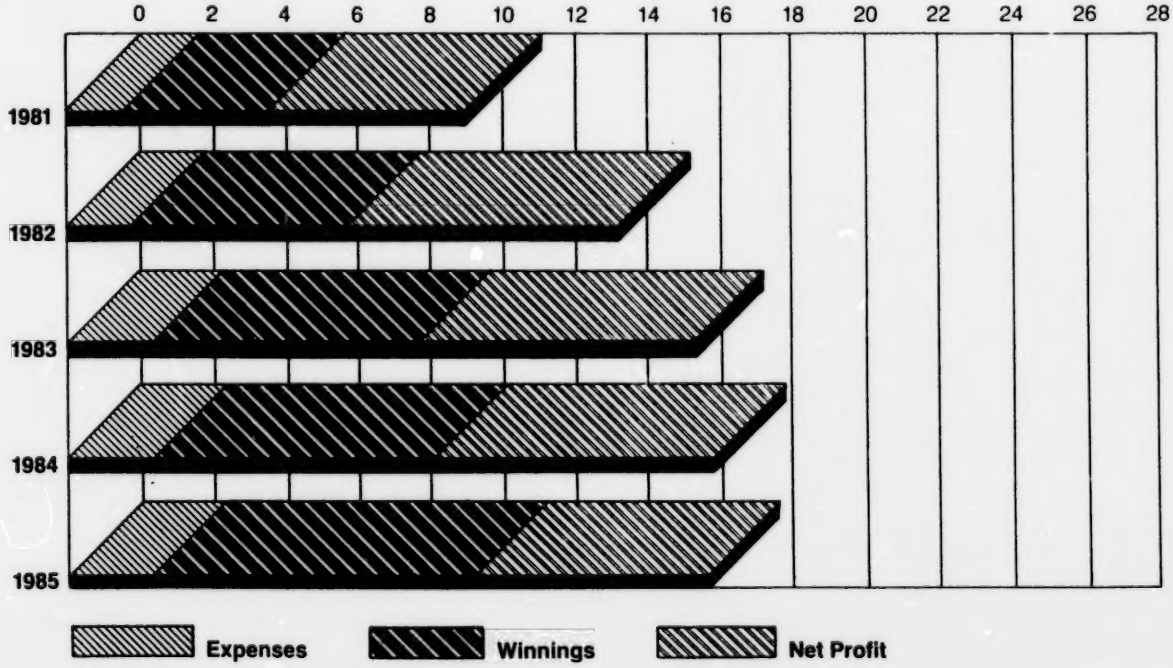

Table 6 Regional Breakdown — All Licenced Gaming 1985

	Licences	Events	$ Licence Fees	$ Total Gross	$ Prizes/Winnings	%	$ Expenses	%	$ Net Profit	%
Edmonton										
Bingo	618	9,717	—	53,620,030	37,956,324	70.8	6,792,028	12.7	8,871,678	16.5
Casino	193	392	144,570	45,154,450	35,041,155	77.6	3,742,636	8.3	6,370,659	14.1
Raffle	490	1,040	7,600	4,530,778	2,130,057	47.0	710,463	15.7	1,690,258	37.3
Pull Ticket	32	32	134,158	13,384,032	9,986,688	74.6	816,105	6.1	2,581,239	19.3
TOTAL	**1,333**	**11,181**	**286,328**	**116,689,290**	**85,114,224**	**73.0**	**12,061,232**	**10.3**	**19,513,834**	**16.7**
Calgary										
Bingo	204	7,939	—	31,013,918	22,163,173	71.4	4,360,592	14.1	4,490,153	14.5
Casino	194	394	153,750	48,463,121	38,217,173	78.9	4,611,219	9.5	5,634,729	11.6
Raffle	355	2,343	11,000	3,496,335	1,203,955	34.4	741,800	21.2	1,550,580	44.4
Pull Ticket	143	143	339,415	33,653,160	24,799,329	73.7	1,994,070	5.9	6,859,761	20.4
TOTAL	**896**	**10,819**	**504,165**	**116,626,534**	**86,383,630**	**74.1**	**11,707,681**	**10.0**	**18,535,223**	**15.9**
Ft. McMurray										
Bingo	12	431	—	1,426,760	990,806	69.4	126,389	8.9	309,565	21.7
Casino	20	42	4,980	809,604	601,225	74.3	119,127	14.7	89,252	11.0
Raffle	42	55	—	177,141	75,617	42.7	6,336	3.6	95,188	53.7
Pull Ticket	6	6	19,359	1,903,939	1,460,720	76.7	92,525	4.9	350,694	18.4
TOTAL	**80**	**534**	**24,339**	**4,317,444**	**3,128,368**	**72.4**	**344,377**	**8.0**	**844,699**	**19.6**
Grande Prairie										
Bingo	33	603	—	2,560,279	1,663,922	65.0	273,194	10.7	623,163	24.3
Casino	4	9	1,130	192,732	126,305	65.5	31,421	16.3	35,006	18.2
Raffle	54	78	—	265,850	114,300	43.0	37,861	14.2	113,689	42.8
Pull Ticket	11	11	18,482	1,837,142	1,354,960	73.8	115,880	6.3	366,302	19.9
TOTAL	**102**	**701**	**19,612**	**4,856,003**	**3,259,487**	**67.1**	**458,356**	**9.5**	**1,138,160**	**23.4**
Lethbridge										
Bingo	39	1,180	—	3,761,635	2,585,057	68.7	521,945	13.9	654,633	17.4
Casino	7	18	6,670	790,427	575,690	72.8	126,500	16.0	88,237	11.2
Raffle	71	167	400	281,588	122,067	43.3	17,714	6.3	141,807	50.4
Pull Ticket	21	21	77,680	7,748,521	5,758,425	74.3	503,347	6.5	1,486,749	19.2
TOTAL	**138**	**1,386**	**84,750**	**12,582,171**	**9,041,239**	**71.9**	**1,169,506**	**9.3**	**2,371,426**	**18.8**
Medicine Hat										
Bingo	21	712	—	1,047,093	794,812	75.9	133,910	12.8	118,371	11.0
Casino	20	44	9,460	1,754,358	1,304,548	74.4	242,676	13.8	207,134	11.8
Raffle	70	338	950	582,379	271,585	46.6	36,237	6.2	274,557	47.2
Pull Ticket	15	15	45,266	4,500,004	3,297,726	73.3	315,027	7.0	887,251	19.7
TOTAL	**126**	**1,109**	**55,676**	**7,883,834**	**5,668,671**	**71.9**	**727,850**	**9.2**	**1,487,313**	**18.9**
Red Deer										
Bingo	38	898	—	4,904,817	3,764,350	76.7	618,032	12.6	522,435	10.7
Casino	16	36	10,330	1,238,015	941,612	76.1	208,604	16.8	87,799	7.1
Raffle	74	283	—	664,822	303,787	45.7	67,494	10.1	293,541	44.2
Pull Ticket	8	8	32,116	3,202,961	2,373,408	74.1	197,735	6.2	631,818	19.7
TOTAL	**136**	**1,225**	**42,446**	**10,010,615**	**7,383,157**	**73.8**	**1,091,865**	**10.9**	**1,535,593**	**15.3**
All Other										
Bingo	1,036	18,240	—	24,208,557	16,673,338	68.9	2,365,349	9.8	5,169,870	21.3
Casino	121	219	25,940	3,863,608	3,024,194	78.3	593,478	15.0	245,936	6.4
Raffle	2,241	5,794	50	7,739,252	3,528,015	45.6	734,179	9.5	3,477,058	44.9
Pull Ticket	435	435	356,916	35,333,211	26,162,379	74.0	2,090,094	6.0	7,080,738	20.0
TOTAL	**3,833**	**24,688**	**382,906**	**71,144,628**	**49,387,926**	**69.4**	**5,783,100**	**8.1**	**15,973,602**	**22.5**

Table 7 Regional Breakdown — % of Provincial Total 1985

AREA	Licences		Events		Licence Fees		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	1,333	20.1	11,181	21.7	286,328	20.5	116,689,290	33.9	85,114,224	34.1	12,061,232	36.2	19,513,834	31.8
Calgary	896	13.5	10,819	20.9	504,165	36.0	116,626,534	33.9	86,383,630	34.6	11,707,681	35.1	18,535,223	30.2
Ft. McMurray	80	1.2	534	1.0	24,339	1.7	4,317,444	1.2	3,128,368	1.3	344,377	1.0	844,699	1.4
Gr. Prairie	102	1.5	701	1.4	19,612	1.4	4,856,003	1.4	3,259,487	1.3	458,356	1.4	1,138,160	1.8
Lethbridge	138	2.1	1,386	2.7	84,750	6.1	12,582,171	3.7	9,041,239	3.6	1,169,506	3.5	2,371,426	3.9
Med. Hat	126	1.9	1,109	2.1	55,676	4.0	7,883,834	2.3	5,668,671	2.3	727,850	2.2	1,487,313	2.4
Red Deer	136	2.0	1,225	2.4	42,446	3.0	10,010,615	2.9	7,383,157	3.0	1,091,865	3.3	1,535,593	2.5
All Other	3,833	57.7	24,688	47.8	382,906	27.3	71,144,629	20.7	49,387,927	19.8	5,783,100	17.3	15,973,602	26.0
TOTAL	**6,644**	**100.0**	**51,643**	**100.0**	**1,400,222**	**100.0**	**344,110,520**	**100.0**	**249,366,703**	**100.0**	**33,343,967**	**100.0**	**61,399,850**	**100.0**

Table 8 Bingos Regional Breakdown 1985

AREA	Licences		Events		Licence Fees		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	618	30.9	9,717	24.5	—		53,620,030	43.8	37,956,324	43.8	6,792,028	44.7	8,871,678	42.7
Calgary	204	10.2	7,939	20.0	—		31,013,918	25.3	22,163,173	25.6	4,360,592	28.7	4,490,153	21.6
Ft. McMurray	12	.6	431	1.1	—		1,426,760	1.2	990,806	1.1	126,389	.8	309,565	1.5
Gr. Prairie	33	1.7	603	1.5	—		2,560,279	2.1	1,663,922	1.9	273,194	1.8	623,163	3.0
Lethbridge	39	1.9	1,180	3.0	—		3,761,635	3.1	2,585,057	3.0	521,945	3.4	654,633	3.2
Med. Hat	21	1.0	712	1.8	—		1,047,093	.8	794,812	.9	133,910	.9	118,371	.6
Red Deer	38	1.9	898	2.2	—		4,904,817	4.0	3,764,350	4.4	618,032	4.1	522,435	2.5
All Other	1,036	51.8	18,240	45.9	—		24,208,557	19.7	16,673,338	19.3	2,365,349	15.6	5,169,870	24.9
TOTAL	**2,001**	**100.0**	**39,720**	**100.0**	—		**122,543,089**	**100.0**	**86,591,782**	**100.0**	**15,191,439**	**100.0**	**20,759,868**	**100.0**

Table 9 Casinos Regional Breakdown 1985

AREA	Licences		Events		Licence Fees		Gross*		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	193	33.6	392	34.0	144,570	40.5	45,154,450	44.1	35,041,155	43.9	3,742,636	38.7	6,370,659	49.9
Calgary	194	33.7	394	34.1	153,750	43.1	48,463,121	47.4	38,217,173	47.9	4,611,219	47.7	5,634,729	44.2
Ft. McMurray	20	3.5	42	3.6	4,980	1.4	809,604	.8	601,225	.7	119,127	1.2	89,252	.7
Gr. Prairie	4	.7	9	.8	1,130	.3	192,732	.2	126,305	.2	31,421	.3	35,006	.3
Lethbridge	7	1.2	18	1.6	6,670	1.9	790,427	.8	575,690	.7	126,500	1.3	88,237	.7
Med. Hat	20	3.5	44	3.8	9,460	2.6	1,754,358	1.7	1,304,548	1.6	242,676	2.5	207,134	1.6
Red Deer	16	2.8	36	3.1	10,330	2.9	1,238,015	1.2	941,612	1.2	208,604	2.2	87,799	.7
All Other	121	21.0	219	19.0	25,940	7.3	3,863,608	3.8	3,024,194	3.8	593,478	6.1	245,936	1.9
TOTAL	**575**	**100.0**	**1,154**	**100.0**	**356,830**	**100.0**	**102,266,315**	**100.0**	**79,831,902**	**100.0**	**9,675,661**	**100.0**	**12,758,752**	**100.0**

*For casinos, "gross" equals "drop" — the total of money spent to purchase chips.

Table 10 Pull-Tickets
Regional Breakdown 1985

AREA	Licences		Events		Licence Fees		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	32	4.8	32	4.8	134,158	13.1	13,384,032	13.2	9,986,688	13.3	816,105	13.3	2,581,239	12.8
Calgary	143	21.3	143	21.3	339,415	33.2	33,653,160	33.1	24,799,329	33.0	1,994,070	32.6	6,859,761	33.9
Ft. McMurray	6	.9	6	.9	19,359	1.9	1,903,939	1.9	1,460,720	1.9	92,525	1.5	350,694	1.7
Gr. Prairie	11	1.7	11	1.7	18,482	1.8	1,837,142	1.8	1,354,960	1.8	115,880	1.9	366,302	1.8
Lethbridge	21	3.1	21	3.1	77,680	7.6	7,748,521	7.6	5,758,425	7.7	503,347	8.2	1,486,749	7.3
Med. Hat	15	2.2	15	2.2	45,266	4.4	4,500,004	4.4	3,297,726	4.4	315,027	5.2	887,251	4.4
Red Deer	8	1.2	8	1.2	32,116	3.1	3,202,961	3.2	2,373,408	3.1	197,735	3.2	631,818	3.1
All Other	435	64.8	435	64.8	356,916	34.9	35,333,211	34.8	26,162,379	34.8	2,090,094	34.1	7,080,738	35.0
TOTAL	**671**	**100.0**	**671**	**100.0**	**1,023,392**	**100.0**	**101,562,970**	**100.0**	**75,193,635**	**100.0**	**6,124,783**	**100.0**	**20,244,552**	**100.0**

Table 11 Raffles
Regional Breakdown 1985

AREA	Licences		Events		Licence Fees*		Gross		Prizes/Winnings		Expenses		Net Profit	
	No.	%	No.	%	$	%	$	%	$	%	$	%	$	%
Edmonton	490	14.4	1,040	10.3	7,600	38.0	4,530,778	25.5	2,130,057	27.5	710,463	30.2	1,690,258	22.1
Calgary	355	10.4	2,343	23.2	11,800	55.0	3,496,335	19.7	1,203,955	15.5	741,800	31.5	1,550,580	20.3
Ft. McMurray	42	1.2	55	.5	—	—	177,141	1.0	75,617	1.0	6,336	.3	95,188	1.3
Gr. Prairie	54	1.6	78	.8	—	—	265,850	1.5	114,300	1.5	37,861	1.6	113,689	1.5
Lethbridge	71	2.1	167	1.7	400	2.0	281,588	1.6	122,067	1.6	17,714	.8	141,807	1.9
Med. Hat	70	2.1	338	3.3	950	4.8	582,379	3.3	271,585	3.5	36,237	1.5	274,557	3.6
Red Deer	74	2.2	283	2.8	—	—	664,822	3.8	303,787	3.9	67,494	2.9	293,541	3.8
All Other	2,241	66.0	5,794	57.4	50	.2	7,739,252	43.6	3,528,015	45.5	734,179	31.2	3,477,058	45.5
TOTAL	**3,397**	**100.0**	**10,098**	**100.0**	**20,000**	**100.0**	**17,738,145**	**100.0**	**7,749,383**	**100.0**	**2,352,084**	**100.0**	**7,636,678**	**100.0**

*For agricultural fairs and exhibition boards only.